

APR - 4 2008

INFORMATION

Case No.

18 U.S.C. § 1001

Defendant.

COUNT 1

1. At all times material to this information:
 - (a) The hunting of black bears in the State of Wisconsin was regulated by state law and allowed only in specific geographical areas known as Zone A, Zone B, and Zone C. The Wisconsin Department of Natural Resources (DNR) created a subzone in Zone A designated as Subzone A1. The DNR created the subzone to shift hunting pressure from the more heavily hunted portions of Zone A to the less heavily hunted Subzone A1. Each year the DNR issued a limited number of bear hunting licenses. A hunter with a Zone A license was allowed to hunt in the entire zone, including Subzone A1. A hunter with a license to hunt in Subzone A1, however, was authorized to hunt only in Subzone A1, not in the rest of Zone A.
 - (b) Each licensed hunter received a numbered tag from the DNR. The tag listed the zone or subzone in which the hunter was authorized to kill a bear. When a hunter killed a bear, Wisconsin law required the hunter to immediately tag the bear

and transport it to a registration station located within the zone or subzone in which the bear had been killed.

(c) On September 1, 2006, the DNR issued a license to WALTER J. PALMER, authorizing him to hunt and kill a bear only in Subzone A1. On September 30, 2006, PALMER, with the assistance of Chad Barth, Trent Waggoner, and others, hunted and killed a black bear near Phillips in Price County, Wisconsin, at a location in Zone A approximately 40 miles by vehicle outside of Subzone A1.

(d) After learning that the bear had been killed illegally, PALMER, Barth, Waggoner, and others agreed that if any authorities were to ask where the bear had been killed, they would say it had been killed off Taylor Lake Road south of Minong, a location in Subzone A1. PALMER and others transported the bear carcass from Zone A in the vicinity of Philips, Wisconsin, to a registration station in Subzone A1. At the registration station, PALMER filed a Bear Registration Stub, falsely certifying that the bear had been killed in Washburn County in Subzone A1. PALMER later caused the bear carcass to be transported from Wisconsin to Minnesota.

2. During the period from October 15, 2006, to October 25, 2006, the defendant,

WALTER J. PALMER,

knowingly made material false statements to an agent of the Department of the Interior, U. S. Fish and Wildlife Service, in a matter within the jurisdiction of the executive branch of the Government of the United States. Specifically, in interviews with a special

agent of the U. S. Fish and Wildlife Service, PALMER falsely stated that he believed he had shot the bear off Taylor Road, and falsely stated that he thought the bear had been killed legally.


(In violation of Title 18, United States Code, Section 1001.)

FORFEITURE ALLEGATION

1. Paragraph 1 of Count 1 is re-alleged here as Paragraph 1.
2. Pursuant to Title 16, United States Code, Sections 3374(a)(1), upon PALMER'S conviction of Count One of this information, the remains of the black bear shall be subject to forfeiture to the United States.

Date

4-4-2008


ERIK C. PETERSON
United States Attorney